

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES UNION, *et al.*,

Plaintiffs,

v.

FEDERAL BUREAU OF INVESTIGATION;
UNITED STATES DEPARTMENT OF JUSTICE,

Defendants.

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) Civ. A. No. 1:05-CV-1004 (ESH)
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) Judge Ellen S. Huvelle
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DEFENDANTS' MOTION FOR A STAY OF PROCEEDINGS

Defendants, by and through their undersigned counsel, hereby move for a stay of proceedings in this action pursuant to Section 552(a)(6)(C)(i) of the Freedom of Information Act ("FOIA), 5 U.S.C. § 552(a)(6)(C)(i), and *Open America v. Watergate Special Prosecution Force*, 547 F.2d 605 (D.C. Cir. 1976). The grounds for this motion are set in Defendants' accompanying Memorandum of Points and Authorities. A proposed order is submitted herewith.

Respectfully Submitted,

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Dated: July 5, 2005

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[PROPOSED] ORDER

Upon consideration of Defendants' Motion for a Stay of Proceedings pursuant to Section 552(a)(6)(C)(i) of the Freedom of Information Act ("FOIA), 5 U.S.C. § 552(a)(6)(C)(i), and *Open America v. Watergate Special Prosecution Force*, 547 F.2d 605 (D.C. Cir. 1976), the record of this case, and good cause appearing, it is

HEREBY ORDERED THAT Defendants' Motion for a Stay of Proceedings shall be and here is GRANTED; and it is

FURTHER ORDERED THAT further proceedings in this action shall be stayed until further order of the Court.

SO ORDERED:

Date: _____

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2005, the foregoing *Defendants' Motion for a Stay of Proceedings* was filed electronically and served by means of the Court's ECF notice system. See Local Rule 5.4(d)(1). If otherwise necessary, the foregoing will also be served directly by electronic mail and first-class mail, postage pre-paid, on:

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